| Organization | Comment | Plan Section | DNR Repsonse |
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| None | The plan does not mention the rise of wood pellets as a economical alternative to home heating. | 3.5.1 | Revised current Goal 6 in Section 4.1.2.2 to address bio-energy, including wood pellets. |
| Huron Pines RC&D | We appreciated the specific objectives outlined in Section 4, Statewide Management Direction. Among other items, your recognition of the need for good markets and the importance of the forest products industry is a key concept for land management and that was expressed clearly in the document. | 4 | Support acknowledged |
| Michigan Association of Timbermen | The four functions provided by the desired future conditions again seem light on the economic benefits. The statement “Providing for a variety of forest-based products” is a broad and generic statement of which wood based products may or may not be included. | 4.1 | Ecological, economic and social uses and values are all considered for sustainable management using principles of ecosystem management. The SFMP states that there is no explicit order of priority among these uses and values. |
| Michigan Association of Timbermen | A major concern is the absence of an annual harvest level in either acres or volume. The plan indicates an average annual harvest level which indicates the state’s production levels will fluctuate. This makes it very difficult for an industry to plan on where they will acquire their needed fiber. We feel the establishment and documentation of such goals would play a major role in promoting and encouraging forest product companies to locate in Michigan. At a minimum, this section should mention the harvest acreage goal identified in state law. Loss to mortality could be captured if our harvest levels were greater. | 4.1.2.2, 3.1.3 | In Section 3.1.3, the SFMP does provide a projection for the annual production capability for timber harvest, that being similar or slightly more than the past decades' average level of 53,000 acres. This projection is based on trend analysis of cover types presented in the same section, known influences on harvest levels, and no dramatic changes in policies or procedures. A goal was added to Section 4.1.2.2 to prepare for harvest a minimum of 53,000 acres per year. The SFMP is intentionally less specific than will be the Regional State Forest Management Plans (RSFMPs) that are under development in 2008. Specificity in the RSFMPs will be based upon detailed analysis at the local level and will provide a good basis for managment direction for cover types. In aggregate, the annual compartment review process also provides an annual harvest level. |
| Michigan Association of Timbermen | This plan does not address “Biomass” management. The shift in our country and states energy needs will put added pressure on the State’s natural resources. How will this affect our State forests and how will you manage for “biomass”. As your numbers indicated, the volume lost to mortality is about equal to that of harvest volumes, so one would think we should have an ample supply of biomass. However, not having any referenced “biomass management guidelines” we do not know how much of the dying material would be available for biomass harvesting. Again, having annual numbers of “biomass” availability will help bring new markets to our State. | 4.1.2.2 | Section 4.1.2.2 Goals 2, 5 and 6 were added to address biomass. New biomass Guideline 11 was added to Section 4.2.2.1. Objectives 7 was added to Section 4.1.12. |

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| Michigan Association of Timbermen | It is evident that the forest planning process is being driven by the state's recent forest certification. We suspect that during the certification process that the current management of state forestlands was deficient in certain areas pertaining to either SFI or FSC certification standards. It would be helpful to acknowledge or indicate what sections are addressing these deficiencies within the forest plan. We understand that these deficiencies need to be addressed however; we feel that this draft is weighted too heavily on areas with limited or no management activities. A sustainable supply of forest products seems to be a low priority. It is often viewed as the means to manage vegetation to achieve other resource-use goals or viewed as a by-product. The forest plan should strike a balance between the social, economic and ecological benefits for current and future users of Michigan's forest. | 4 | The SFMP is not driven primarily by forest certification, but rather by Part 525 Sustainable Forestry on State Forest Lands, of PA 451 which requires the DNR to develop a forest resource management plan and the State Forest to be certified. The SFMP is also part of a 2001 initiative to manage the State Forest using principles of ecosystem management. Many components of the SFMP are consistent with requirements found in both Part 525 and the certification standards. Forest products will continue to be significant outputs of the State Forest, in concert with other resource uses and values. A major accomplishment of the SFMP is that it organizes many existing programs and initiatives into one document. |
| Michigan Association of Timbermen | This section identifies several standards and guidelines proposed for use in management most of which have no scientifically applied research basis while applied silvicultural guidelines that have been scientifically developed with over 75 years of proven application are absent. It is disingenuous to promote unproven philosophical management strategies as prescribed in this section to achieve sustainable ecosystem management goals. | 4.1.2 | Opinion noted. The SFMP includes existing operative standards and guidelines which have an impact on State Forest management. The first Guidline in Section 4.1.2.2 specifies the use of DNR Silvicultural Guidelines in developing management prescriptions. |
| Michigan Association of Timbermen | This section does not mention forest health as a monitoring tool to determine management success. Forest health monitoring is essential to identifying conditions impacting biological diversity. | 4.1.2 | The forest health monitoring program is listed as a monitoring program in Section 6 of the SFMP. Section 4.1.2.2 Guidelines 11 and 12 also address this issue. |
| Michigan Association of Timbermen | The special emphasis to restore the mesic conifer component within the mesic conifer-deciduous communities. How many acres are going to be restored and what's the "future desired condition" for this community? We would hope you would review past attempts first to see if or how this objective could be successfully accomplished. | 4.1.2.1 | Restoration of mesic conifer components in some cover types is consistent with DNR Within-Stand Retentions Guidelines and consistent with forest certification standards. In many areas, this restoration is a natural process, with diversification of forest species composition occurring without proactive encouragement. The increasing prevalence of white pine in some oak communities is a good example of this phenomenon. |
| Michigan Association of Timbermen | We question Goal 7 managing mid-successional cover types as all aged class distributions across the landscape. The silvics of red and white oak we believe are better suited for even-aged management. | 4.1.2.2 | The treatment of a forest stand depends upon the site, species, and desired future condition. Even-aged management is not always the appropriate or effective silvicultural method, particularly as older trees begin to lose their vigor for coppice reproduction. Shelterwood prescriptions are also an effective method of regeneration, both within current oak and other cover types. For example, the DNR has documented good oak regeneration within the understory of current red pine stands. |

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| Michigan Association of Timbermen | This section calls for acquisition of large tracts of forest land for public access. We don't believe this should be a function of state forest management. While we agree that easements should be pursued for access to state forest land for management, public access or trail corridor connectivity, conservation easements beyond those purposes should not be included in a state forest plan. | 4.1.5.1 | The purpose of this goal is to offset or relieve pressure on state lands (keeps land as productive forest for timber, habitat and hunting values and uses). Goal 4 has been re-stated as: "In coordination with planning efforts and/or partners, consider the use of conservation easements on commercial forest lands as one tool for achieving agreed upon social, economic or ecological values." |
| Michigan Association of Timbermen | We support the three goals to inventory and track the maintenance needs of our forest road infrastructure. A concern of ours is where the funding comes from to implement or achieve the objectives. We feel any permanent improvement to these roads should come at the expense of the Department. | 4.1.9.1 | Support acknowledged. The SFMP does not specify the funding mechanism for road maintenance. Historically, some funding has originated from recreation programs and some maintenance is specified in Timber Sale Contracts. These funding sources are not likely to change. |
| Michigan Association of Timbermen | To "minimize the number and length of new logging roads and skid trails." In addition to providing access to manage stands that are prescribed as part of a management plan, these trails provide access for snowmobiling, cross-country skiing, and hiking. Stakeholders often ask for more public access to state forests and this can be secured through road and trail building that is part of forest management activity. | 4.1.9.3 | Fragmentation of forest resources and unauthorized ORV use are major issues in management of the State Forest. Recreational trail and pathway development is also a part of forest management, but not all logging roads and trails are appropriate for recreational use. Recreational trails and pathways will be provided where they are appropriate. |
| Michigan Association of Timbermen | As part of the requirement to become certified a provision was included to establish 4 pilot projects to demonstrate sustainable forestry practices and management across our state forestlands; these pilot projects have been omitted from this plan. We urge the Department to incorporate these pilot projects into this section of Research and Education. | 4.1.12 | The pilot areas are intended to diversify adminstrative handling of activities and are not a forest management plan element, nor are they related to research. Pilot areas are not a certification requirement. They are, however, a provision of Part 525, Sustainable Forestry on State Forestlands. The areas have been established as required by statute. |
| Michigan Association of Timbermen | Another research tool that we feel is lacking within Michigan's forest system is the absence of Continuous Forest Inventory (CFI) Plots. CFI plots can provide valuable information as to how the forests are growing and responding to silvicultural prescriptions. These plots could also help establish the goals for fiber production and harvest as well as show if the forest is moving towards the future desired conditions. | 4.1.12 | The DNR has proposed, and the Michigan Forest Finance Authority has accepted a proposal to contract for the design and installation of CFI-like, periodically remeasured, plots across the State Forest System. The approval to move ahead is for the design phase only, but the concept was approved for funding up to a specified level. It is anticipated that the system can be designed and installed in the next 3 years. |

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| Michigan Association of Timbermen | This entire section should be condensed to include only those areas that exclude active management such as ecological reference areas, cultural and geological sites and specific areas where active forest management is not feasible. The remainder of the areas should be incorporated into active management strategies within the vegetative management section. Identifying specific special areas sends a message that sustainable forest management does not include the ecological values of the special management area criteria. We feel that if the current conditions are a result of past management activities then sustainable forest management should continue. If the Department deems it necessary to keep this overabundance of special management areas, we have two recommendations 1) that an intensive forest management classification be designated to demonstrate the economic return from intensive forest management and 2) intensive management on mitigated acres to off-set losses of productive acres to these special areas. | 5 | Most of the concepts in the categories of section 5 are not new, but rather organize many existing programs and initiatives into a comprehensive structure. At this time the creation of a Dedicated Timber Management SCA would be redundant to that concept. The Management Area (MA) approach to regional forest planning also addresses this issue, as for many MAs the primary focus of managment direction will be for timber production. |
| Michigan Forest Products Council | Troubled that the plan does not include a sustainable harvest level, despite the Department's recognition of receiving a "large number of comments" indicating this as a need area in the plan. A sustainable harvest level provides the measurable management target to assist in implementing these objectives, and is called for in ISO 14001, SFI, and FSC certification standards. "the SFMP incorporates the expectation that total sustainable timber harvests will remain close to current levels." There is no scientific basis provided for this argument, and in fact, observed increased mortality rates may indicate that current harvest levels in some species are too low to be sustainable. | 4.1.2.2, 3.1.3 | The SFMP provides a projection for the annual production capability for timber harvest in Section 3.1.3, that is similar or slightly more than the past decades' level of 53,000 acres. This projection is based on trend analysis of cover types presented in the same section, known influences on harvest levels, and no dramatic changes in policies or procedures. A goal was added to Section 4.1.2.2 to prepare for harvest a minimum of 53,000 acres per year. Through four forest certification audits, there has been a validation of DNR's sustainable management and the scientific basis for projections of harvest levels. Maintenance of static acreages of specific cover types is not the sole essence of sustainablility, which at its core also includes other values and reflects the continued stewardship of forest resources for the future. Also, overall mortality rates have not increased in the last twenty-five years, but rather show a high degree of stability at low levels relative to other states. |
| None | Acres of old growth (nearly dead) jack-pine everywhere. Cut it, the deer, grouse and turkey will use it if it is dense, young growth and mixed with other trees. As for red-pines planted in the 1930's - still around? PLEASE! | 4.1.2.2, 3.1.3 | The DNR has accelerated harvests of over-mature jack pine over the past ten to fifteen years in response to threatened insect mortality. This is reflected in the youngest age classes showing the greatest amount of acreage. The DNR is also accelerating final harvests of red pine using established guidelines for red pine management. These inititatives are referenced in the SFMP. |

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| Michigan Association of Timbermen | The part that was confusing to me was on page 32, 4th paragraph, third and second to last sentence in the 4th paragraph. "The volume of cedar is increasing with growth more than twice the losses from natural mortality and harvest (Table 3.3). However, some growth is unused with losses of cedar through natural mortality being more then twice the volume that is removed by timber harvest." Can you explain this more in layman terms? I think maybe some punctuation might be missing, however, grammar is not my strong suit. | 3.1.1 | SFMP modified to combine sentences |
| None | I am emailing you in support of the management of early successional forest by the DNR. This state has entirely too much old growth and managing for early successional forest will benefit not only the forests themselves but countless animal species. | 4 | The State Forest Plan has a specific objective in Section 4.1.2.3 to minimize the loss of early successional habiat, of which aspen is the single largest (22%) cover type. The life history of other cover types such as northern hardwoods (13% of the state forest) dictates late successional management. There is a substantial range of public opinion on the desirability of managing the State Forest for old growth versus early successional forests. While the State Forest Plan addresses both of these, other DNR efforts will impact these issues beyond what is in this plan. These other efforts include ecoregional planning, the Biodiversity Conservation Planning Process, and the Wildlife Action Plan. |
| Weyerhaeuser Co. | I am disappointed that the plan does not set any targets to implement these objectives. The SFI Standard in Performance Measure 1.1, Indicator 1.f states that forest management plans will have recommended sustainable harvest levels and Indicator 4 mentions that these harvest levels will be recalculated periodically. Under FSC Principle 7-Management Plans, item 7.1.d is the "Rationale for the annual harvest and species selection". FSC measure 7.1.d.1 states that "Calculations for the harvest of both timber and non timber products are detailed or referenced in the management plan...". The current draft does not meet these requirements of specifying harvest levels. Industry needs to have an idea of the levels of managment to be expected from the State Forests. Existing industry and potential new industry need realistic output forecasts. As the largest forst landowner, the State should be willing to commit to increasing outputs to approach the sustainable level that our forests are capable of. | 4 | The DNR has gone through a forest certification scoping, a full audit and three surveillance audits and has been found to be in compliance with FSC and SFI certification standards. With respect to a recommended sustainable harvest level, the text states that we expect the annual production capability to be similar to or slightly incrase from the past decade's level. This is a annual capacity as noted in our certification audit reports. A goal was added to Section 4.1.2.2 to prepare for harvest a minimum of 53,000 acres per year. The standards also very explicitly note acceptance of multiple plans and the Timber Harvest Trends report provides additional background and specifies realistic harvest forecasts. We currently achieve about 95% of the prescriptions that are proposed under our open, public forest planning process. The greatest impediment to expanded treatments in recent years has been lackluster markets and the extent of no bids on timber proposals. |

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| Weyerhaeuser Co. | My comments are regarding the Statewide Management Direction section of the plan. In this section some very good objectives were set forth including: the regulation of age classes of aspen; the desire to minimize the losses of the aspen forest type where it is well suited to the site; the objective to balance age class distribution of the red pine resource; and the recognition that our northern hardwood forests would be better managed on a continuous basis rather than the 10 year compartment review process. These objectives have a multitude of benefits to foresthealth, wildlife, and to the forest products industry. | 4 | Support for the aspen and red pine management is acknowledged. With respect to northern hardwoods, the text is highly qualified: "...potentially...one possible ...management by conducting inventory, preparing sales, and monitoring much of the forest on a continual basis... The DNR does not have the resources that would enable a shift to a continual management cycle in the near-term, nor would it be necessarily desirable to do so, but such a shift may be possible in the future." |
| Keen Forestry | I'm concerned at the states willingness to give in to environments such as the Sierra Club. Specifically I'm concerned about several issues such as the long term management of Red Pine instead of Clear-cutting some of the stands at the end of the rotation; some areas are just cut heavily and are allowed to have nature take its course. In most cases the stands that I have seen will convert to low quality hardwood stands, which the state has more than enough of. I think these stands should be planted back to red pine it is a great source of income for the state but also creates jobs within the state processing the logs/power poles/pulp/posts/etc. The state should be aggressively managing these stands for red pine and looking to convert other stands to pine stands. | 4.1.2.2 | The DNR has a specific initiative to address the management of red pine (Guidelines for Red Pine Management), which is referenced for use in Section 4.1.2.2. |
| Keen Forestry | The DNR is spending money to plant Hemlock/white pine if I'm not mistaken in the UP of Michigan. I think this is a great waste of money. These habitats on private ground they are planting will switch hands and probably never be managed into a stand viable timber to help the future of Michigan's Economy. This money should be used to plant red pine plantations on private ground which if you look at the result of the CCC camps which planted thousands acres of red pine created a jobs in Michigan. First when they were planted but in the future when these stands needed to be thinned there are several sawmills and thousands of jobs including some in the DNR because of what was done years ago. | 4.1.2.1, 4.1.2.2 | Planting activities on private lands are out of the scope of the SFMP. The SFMP does provide a guideline in Section 4.1.2.1 for restoring mesic conifers for purposes of biodiversity. The DNR has a specific initiative to address the management of red pine (Guidelines for Red Pine Management), which is referenced for use in Section 4.1.2.2. |

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| Michigan Association of Timbermen | We feel that the language used throughout the plan does not reflect strongly enough the impact the cervidae species are having on the state forest. We believe the current deer population is too high and if it is not reduced they will continue to have a significant impact on whether the "future desired conditions" will be meet by the forest management plan. One reason for the failure of establishing the Mesic Conifer forest type is the amount of deer browse on the planted seedlings and/or regeneration. We are concerned with the effort to seek the Mesic Conifer forest type as a future desired conditions when deer populations in the region are high. Northern hardwood stands in areas where the deer population is high are void of any regeneration. This can lead to a stand conversion to a forest type that may not be desirable for other wildlife species. Our beech and ash resources are not highly palatable to the deer and other cervidae and are starting to become a strong presence in our forest understory. The lack of browse on the two species will allow them to become established a | 4.1.2.2 and 4.1.2.3 | Section 3.2.1 Forest Health Conditions and Trends was modified to specifically identify the issue of cervid herbivory. Section 4.1.2.3, Objective 14 addresses the issue of cervid populations and forest biodiversity, regeneration, composition and sustainability. Section 4.1.2.2, General Objective 4 addresses an assessment of the severity and effect of cervid herbivory an forest regeneration. |
| Sierra Club | In every instance where age-class data was presented, it was presented in 10-year increments, with a final class of "100+". Most tree species in Michigan have a natural ecological maturity and life span well over 100 years. The data as presented seems to indicate that this is the natural limit for these trees' life. In essence, this is presenting an artificially truncated age-class distribution. The Department should not present even distribution across an artificially truncated age class, encompassing a minority of the natural life span of the species, as "evenly distributed". We would ask that in future drafts, the actual age classes for each species be described. If the Department wishes to manage longer-lived species for less than 1/3 - 1/2 of the species' natural life span, the Department should describe this and make the case to justify it. This type of classification is especially troubling in the context of goals such as Goal 1 under 4.1.2.1 Biodiversity. This goal includes "balanced age class" in the goal. This implies balance across all age classes, not across an artifici | 4.1.2.1 and 4.1.2.2 | Age class distribution tables in the SFMP do not truncate age class distributions, but rather sum age classes greater than 99 years into one 100+ year category. Where cover types exist as uneven-aged stands (e.g. northern hardwoods) this data is provided as well. |

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| Sierra Club | Rather than describing the Standard, the Draft simply cites another document. This makes it very difficult for the reader to have any idea what actions will actually be taken to implement the Goals, Objectives, and Standards. Many of these documents are available on the Department web site. However, many of them are not available on the Department web site, nor any other web site. Nor are the documents hot linked in the .pdf file. Most of the documents cited as Standards are relevant to the Goals and Objectives, but also contain large portions which are not within the scope of the Goals and Objective. It would be both easier for the readers (including managers who will need to implement this Plan) to understand, as well as more accurate, to replace the citation with the relevant language from the citation. | 4 and 5 | Where possible, the DNR will strive to provide links to referenced documents once the plan is approved and posted on the internet. |
| Sierra Club | We applaud the Department's direction in determining suitability for species based on site conditions. However, we have concerns about the Kotar system, which relies far too heavily on vegetative communities and past management to determine site-specific suitability. Instead, we strongly suggest using the Barnes-Albert-Denton system, which much more significantly takes into account factors such as landforms, soils, slope, aspect, and other factors which are less dependent on past management to produce suitability determinations. That said, the general tone of the discussions regarding over type distribution clearly indicates an intent to keep cover type distribution very similar to existing distribution. This is particularly troubling in the case of early successional species such as aspen, which do not naturally replace themselves on most upland sites. | 4.1.2.2 | The DNR has invested a substantial amount of funding to complete the Kotar Classification system for Michigan, and to train field staff on its field application. The DNR also utilizes Albert's Regional Landscape Ecosystems of Michigan in forest and biodiversity planning. |
| Sierra Club | Given that past management has striven to unnaturally perpetuate early successional species, the current composition and distribution of species across state forest lands is skewed strongly toward these species. This, however, is in conflict with #1 in the Desired Future Condition in 4.1 of the Statewide Management Direction, which indicates that the goal is to "Sustain fundamental ecological processes". Since on of the most fundamental ecological processes on forest in Michigan, especially in a system skewed as far towards early successional species as is currently the case. Native biological diversity, natural ecological processes, and balanced age class and seral stage distribution all argue against maintenance of early successional species on the same sites where they now exist. This is the very nature of succession. | 4.1 | In the context of ecosystem management, the issues for maintenance of early successional species (particularly aspen) is not exclusively a matter of ecological processes. Values for economic (fiber) and social (habitat) pruposes are also factors that have bearing upon the maintenance of early successional cover types. |

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| Sierra Club | P. 1 - The groups whose interests are solicited include local communities and 3 industry groups. No mention is made of the general public or other interest groups. | | The text in this case refelects the language of Part 525, Sustainable Forestry on State Forest Lands, of the Natural Resource and Environmental Protection Act, 1994 PA 451, as amended. |
| Sierra Club | P. 117 - 4.1.2.1 - Biodiversity - We applaud Goals 1 and 2, and note that they require significant movement in the direction of larger amounts of late successional species, and away from the current “aspen uber alles” management direction. | 4.1.2.1 | Support acknowledged. |
| Sierra Club | P. 119 - 4.1.2.2 - Forest Resources - when describing stakeholders, it is inappropriate to singe out one stakeholder, the timber industry, at the expense of all others. | 4.1.2.2 | DFC modified to only refer to stakeholders in general. |
| Sierra Club | P. 120 - 124 - Objectives for Specific Cover Types . 2. Aspen - The objective describes management for aspen on sites where aspen is well suited, without any analysis (using Kotar or others) of what other species are also well suited for the site. This analysis needs to be done, in the context of 4.1.2.1 Goals 1 and 2, which preclude retaining aspen on current aspen sites. | 4.1.2.2 | The objective retains aspen on sites where it is well suited and specifies succession to other cover types where it is poorly suited and where the site is succeeding to another cover type. The DNR believes that this is consistent with Section 4.1.2.1 goals to maintain a variety of succssional states - in this case for aspen. |
| Sierra Club | P. 120 - 124 - Objectives for Specific Cover Types. 7. Red Pine - Balancing the age class distribution at 25-30,000 acres per class would require 625,000 acres of red pine in the 25 10-year age classes appropriate to red pine. We advocate converting aspen acreage to make up the difference. | 4.1.2.2 | The SFMP is not intended to be that prescriptive. Such details will be in Regional State Forest Management Plans. |
| Sierra Club | P. 120 - 124 - Objectives for Specific Cover Types. 21. White Pine - we find specification of a statewide rotational age to be inappropriate. We strongly find a rotational age which is less than 1/3 the life span of a white pine. | 4.1.2.2 | The 100-year roational age reflects market demand for stands that have been primarily managed for timber value. The DNR recognozes that not all white pine stands are managed for this purpose. Objective modified as follows: “Where biodiversity goals to not preclude, increase regeneration harvests of the white pine cover type as planted stands reach the 100+ year rotational age class over the next decade.” |
| Sierra Club | P. 123 - 7 - Early successional species sequester virtually no carbon. | 4.1.2.2 | The DNR believes that all trees sequester some carbon as living biomass. |
| Sierra Club | P. 123 - 8 - The measure of sustainability described is perhaps the poorest measure known if attempting to meet Goals 1 and 2 in 4.1.2.1. | 4.1.2.2 | The statement is but one measure of sustainability. |
| Sierra Club | Section 4.1.6.1 - Oil, Gas, and Metallic and Nonmetallic Mineral Development, pages 137-139. We applaud the Desired Future Condition and Goal #1, with the emphasis on resource protection. In addition, we would urge that the Plan include a Standard requiring that all lands within 1250' of Natural Rivers, their tributaries, or Blue-Ribbon Trout Streams be classified as "Non-Leasable" or "Leasable with no surface development" for oil & gas development. | 4.1.6.1 | Support acknowledged. The purpose of the SFMP is to implement existing rules and policy not to impose new standards. The suggestion of a 1250 foot zone for restriction of oil and gas leases is not appropriate to this plan. |

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| Sierra Club | P. 139 - 4.1.6.2 Unique Geologic Formations. Goal 1 is laudable. It is unfortunate that the Department felt free to disregard this Goal in the case of Eagle Rock, the only exposed bedrock on the entire Yellow Dog Plains. | 4.1.6.2 | Support for the goal is acknowledged. The SFMP is not intended to be prescriptive regarding the designation of specific features. Such details will be in Regional State Forest Management Plans. |
| | Numbers to express annual capability and productivity are not stated; BUT, if trying to encourage investment in the forest products industry including production capacity i.e. loggers, wouldn't some numbers be of value to prospective investors? | | In Section 3.1.3, the SFMP does provide a projection for the annual production capacity for timber harvest, that being similar or slightly more than the past decades' average level of 53,000 acres. This projection is based on trend analysis of cover types presented in the same section, known influences on harvest levels, and no dramatic changes in policies or procedures. A goal was added to Section 4.1.2.2 to prepare for harvest a minimum of 53,000 acres per year. The SFMP is intentionally less specific than will be the Regional State Forest Management Plans (RSFMPs) that are under development in 2008. Specificity in the RSFMPs will be based upon detailed analysis at the local level and will provide a good basis for managment direction for cover types. In aggregate, the annual compartment review process also provides an annual harvest level. |
| | Noted that expected acres to harvest will remain at about 52,000 acres. But I suspect that volumes per acre may decrease and more higher quality product may be harvested in the future in at least the hardwood and red pine types. | 3.1.3 | Volumes per acre for red pine and some other species are expected to increase, as discussed on Page 41 of the SFMP. |
| | Does/should the plan indicate that management objectives may be somewhat different on tax-reverted lands than on lands acquired for other purposes with dedicated funds? | | Section 4.1.1.5 of the plan is intended to address these areas. Many of these areas are also addressed in Section 5.2.6 of the plan. |
| | p.60 Aspen. I like the increased harvest in the 30-39 year age-class as that is when a lot of "natural" mortality occurs in many stands. Perhaps some sort of "thinning" strategy should be investigated that would increase the rate of growth and the volume of higher value product than pulp. Utilization of biomass harvesting may make this more feasible than in the past. | | Support acknowledged. Goals and/or Guidelines for biomass utilization were added to Section 4.1.2.1, 4.1.2.2 and 4.1.2.3 of the plan. |
| | 4.1.1.2 Recreational trail objectives. P.111 Add an objective that would create harsh economic penalties for damage and destruction of trails and other attributes of the forest community, e.g. penalties be commensurate with game law penalties. | 4.1.1.2 | The establishment of enforceable law is beyond the scope of the SFMP. |
| | Objective 10, p.111 Would "visual sensitivity" be a better term than "aesthetic values"? Visual quality is more measurable than is aesthetic value. This would also make a connection to visual sensitivity in the Right to Forest law. | 4.1.1.2 | Public values are a consistent term used throughout the plan. |
| | Standards p.112. Should the Right to Forest law's Generally Accepted Forest Management Practices be considered as standards? | 4.1.12 | Added new objective to Section 4.1.12 to promote Generally Accepted Forest Management Practices. |

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| | 4.1.1.5 Objective 1, p.115. Depending on the acreage involved, I feel that this objective may be too exclusive of other management opportunities. | 4.1.1.5 | The intent of designating “all areas managed primarily for hunting as special conservation areas where hunting is the overriding resource management value” is NOT to exclude other management opportunities, but rather to bring more clarity internally and externally where such places exist. A SCA does not preclude other management. |
| | 4.1.1.5 Guideline, p.115 Add a guideline that would encourage cooperation with DEQ to consider wetland diversity when engaged in wetland mitigation projects and some state land could be used for mitigation projects. | 4.1.1.5 | The DNR does not have the resources become involved in the DEQ commerical wetland mitigation banking program. |
| | 4.1.1.6 p.116. I would prefer this section to be couched in terms of visual sensitivity rather than “aesthetic character”. The Right to Forest GAFMPs should be included in the standards. I feel that the criteria for visual sensitivity are more measurable than is aesthetic character. | 4.1.1.6 | The DNR prefers to retain the word aesthetic. The right to forest Generally Accepted Forestry Management Practices are voluntary guidelines for private lands, whereas standards specify mandatory policies. The intent of the GAFMPs are already contained in other DNR guidelines. |
| | 4.1.2 Guideline 9, p.119. Modify timber sale contracts to encourage tip-up mounds where visual sensitivity is not an over-riding concern. | 4.1.2.1 | Timber sale contracts already implement prescription decisions made through the compartment review process, which include measures from Within-Stand Retention Guidelines. |
| | 4.1.2.2. Forest Resource Goals, p.119. Add a goal which states that the forest resource will be managed to produce a stable revenue source to the State which reflects the increased production of higher value products and increased fiber utilization. | 4.1.2.2 | At this time, “a stable revenue source to the state” is not a DNR statutory or mission goal and could be construed to be in conflict with an emphasis on sustainability, markets, responsiveness to stakeholders, and forest certification. In contrast, the stated second goal in this section states, “Actively manage the state forest for stable, long-term, sustainable timber production.” Two additional goals were added to address timber production, which is the basis for the revenue source. |
| | Objective 1, for aspen, p.120. Perhaps we need to look at aspen as a biomass source and also lumber and composite material and not primarily as a pulpwood, i.e. paper, source. This could better utilize the fiber currently lost in many stands beginning in mid-age and could help reach sawlog size quicker. This might be a tool to use in balancing age-class distribution. | 4.1.2.2 | An objective was added to Section 4.1.3.1 to develop biomass harvesting guidance to silvicultural prescriptions. Goal 5 in Section 4.1.2.2 was also modified to address biomass. |
| | Objective 5, p.120. I’m not an advocate for encouraging hemlock in high quality hardwood stands. I also question nurse logs for regeneration purposes as in my experience it is quite rare to see a good quality tree survive very long when it had its beginnings on a nurse log or stump, i.e. stilted trees. | 4.1.2.2 | Within-stand species diversity and downed woody debris are objectives of DNR Within-Stand Retention Guidance. Nurse logs are part of the natural life history of many hemlock trees. |
| | Objective 8, Oak, p.121. Perhaps the Objectives need to distinguish between the oak species somewhat, e.g. the way one manages for Northern Red Oak vs. Pin Oak might be quite different. | 4.1.2.2 | Oak management does differ depending upon the species and site. Further research and guidance on this is forthcoming which will enable oak objectives to be more elaborate in the future; at this time, the general direction is to attempt to retain oak and balance age classes through more regeneration cuts in the 70-90 years old oak. Opportunities for differentiation of oak management will be presented in Regional State Forest Management Plans. |

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| | Objectives 13-14, p.121. I'm concerned about Fir. To me it is a relatively short-lived weed and can out-compete other plant community species. I do feel it should be managed as important species. | 4.1.2.2 | Opinion acknowledged. Fir is a codominant species in many forest stands and present in the understory of many others. Fir is also a component of within-stand species diversity that is addressed in DNR Within-Stand Retention Guidance. |
| | Objective 18, p.121. Black Spruce---should we look at the role of tip-ups as a tool for regeneration? | 4.1.2.2 | As descibed in the objective vegetative reproduction through layering would be achieved by soil contact of branches, which may involve "tip-ups". |
| | Objective 20, Swamp conifers, p.121. My experience indicates that swamp conifers regenerate quite well and quickly following strip regeneration harvests and fire may not be necessary to get good stand replacement. Even cedar regenerates well until the deer find it. | 4.1.2.2 | Opinion acknowledged. The DNR acknowledges that there are multiple means of regenerating swamp conifers, and the judicious use of fire and vegetative reproduction are but two. |
| | Objective for Stake Holder Relations, p.122. Add an Objective that would support the Master Logger Certification process as a tool to assist in improved private non-industrial landowner management of small ownerships, i.e. <100 acres. | 4.1.2.2 | This specific suggestion is beyond the scope of the plan, but Stakeholder Relation Objective 3 provides that the DNR will "Participate in forest certification, wood product use, and marketing programs and meetings." |
| | Standards, p122. Add a Standard that references the Michigan Master Logger Certification Program. | 4.1.2.2 | This specific suggestion is beyond the scope of the plan, but Stakeholder Relation Objective 3 provides that the DNR will "Participate in forest certification, wood product use, and marketing programs and meetings." |
| | Guideline, p.123. The Guidelines seem to be heavily skewed toward ecological considerations. I feel more emphasis needs to be placed on recognizing the impact of management activities on sustainable human communities at local, regional and state levels. | 4.1.2.2 | The broad array of considerations and multitude of ecological constraints on timber harvests make ongoing management activities socially and economically acceptable. This Plan does indeed emphasize the ecological sensitivity which is applied in our management activities, which in turn enables ongoing positive social and economic impacts. The latter are addressed more in the "Goals" and "Objectives for Stakeholder Relations" subsections. They will also be major considerations in the Management Area designations of the ecoregional planning efforts. |
| | Guidelines 9 & 11, p.123. I would prefer to use the terms "regeneration", "salvage" and "sanitation" instead of "clearcut". | 4.1.2.2 | Clearcut is the most commonly understood term; even the Sustainable Forestry Initiative with its ties to industry uses this terminology in its annual reporting. |
| | 4.1.2.3 Objective 12, p 125. Don't be afraid to harvest cedar to keep the resource healthy. I have seen an awful lot of real junky cedar on various ownerships that people were attempting "saving". | 4.1.2.3 | Comment acknowledged. Greater treatments in cedar will be dependent upon a common perception of the desireability of such treatments. In turn, that will be dependent upon markets, allaying wildlife concerns, and social acceptability. |
| | 4.1.3.2 Objective 9, p129. Also manage for water production. | 4.1.3.2 | Attenuated flow of water is an implied product of managing functional wetland resources. |

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| Mackinaw Forest Council | The focus of the plan seem to be an “emphasis on balancing age classes” which will perpetuate a disturbed, compositionally and structurally simplified landscape that is not reflective of Michigan’s native forest habitat (again see section 3.3.1). Creating a forest landscape based primarily on an even distribution of acres to each age class up to economic rotation age, and focusing on cutting stands older than this age will have a very negative effect on the continued recovery of our state forests. | 4 | Section 4.1.2.2 Objective 2 retains aspen on sites where it is well suited and specifies succession to other cover types where it is poorly suited and where the site is succeeding to another cover type. The objective strives to address competing desires for maintenance of early successional forests for fiber and habitat and also provision of later succession forests for purposes of landscape diversity. |
| Mackinaw Forest Council | Mimicking natural processes (disturbance) and maintaining composition and structure of native ecosystems, is not specified in a concrete way, although it is a directly conflicting DFC in section 4.1.2.1. The DFC in 4.1.2.1 seem to call for restoring, enhancing composition, structure and process, yet the deliverable objective statements in 4.1.2.2 make it clear that area regulation at short time frames will drive the future condition of the forest. Natural processes will be truncated and the landscape will be held in a disturbed unnatural condition across most of the State Forest. | 4.1.2.1 and 4.1.2.2 | Goal 1 and Guideline 9 of Section 4.1.2.1 addresses the encouragement of natural disturbance processes. Guidelines are also provided in Sections 4.1.2.1 and 4.1.2.2 to implement Within-Stand Retention Guidelines for increased structural and compositional diversity of forest stands. Area regulation is not the goal for all acreages and age classess of forest types, and several goals in Section 4.1.2.2 provide qualifications (e.g. for habitat) upon the balancing of age classes. With the exception of some SCA, HCVA categories and the ERA categories there is no expressed goal to maintain the entire State Forest in an undisturbed natural condition. |
| Mackinaw Forest Council | The desired future conditions (DFCs) that are supposed to guide management of the State Forest system are vague and so non-specific as to be meaningless. They are just feel good bromides, that give little if any guidance. DFC’s for MNFI or Kotar communities types are non-existent. There needs to be DFCs that tie together landscapes, natural communities and this plan into a coherent whole. | 4 | Opinion noted. |
| Mackinaw Forest Council | 1.4.2 Strategic Goals, SFMP pg 7. This strategic goal is just unintelligent! A plan must set priorities, or it's not a plan, you can not have equal emphasis. The forest, and it's ecology, and it survivability, make possible any social or economic values that are sustainable. Ecological viability is the foundation of sustainable society, not an equal element to be balanced with short term social or economic use. (see your own definition of ecosystem management) The DNR seems to fundamentally lack an understanding of ecosystem management, which leads to a SFMP that is 1) not sustainable, and 2) is full of unspecified tradeoffs that are not qualified, nor quantified. The DNR claims that tradeoffs are inevitable, but never explains in detail what they are. For more details see our previous comments that have received no substantial response. | 1.4.2 | The DNR agrees that under the concept of ecosystem management the condition of the ecosystem sustains the production of all uses and values. However, ecosystem management doesn't mean that social and economic uses and values are over-ridden by ecological values. |

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| Mackinaw Forest Council | Further the DNR claims that Michigan's forest's can not be allowed to continue their recovery from first spasm of uncontrolled logging. You claim that social and economic forces require that the State Forest be largely maintained in it's current heavily disturbed second growth condition. The all mighty "balanced aged classes" (on very short rotations) is your over riding mantra for management. What is the basis of this claim? Can you offer actual data proving this assertion that recovery is precluded? Do you have data showing that the people of Michigan do not want their forest fully restored? (the social element) Did our original forest have less biomass per acre? Were they less healthy? or resilient? (economic element) What is the basis for this claim that full recovery is precluded by current social and economic realities? | 4 | The DNR received a substantial number of public comments against restoration of the State Forest to "circa 1800" conditions. The DNR also received a substantial number of comments advocating restoration. There is no public consensus on this issue. |
| Mackinaw Forest Council | Lastly, in response to comments, and on page 109 of the SFMP, it is stated that the DFC's were developed using an iterative process involving the public. We are unaware of any such process! The first knowledge of the SFMP was the release of the "draft" plan of over 200 pages and nearly complete. There was no process where the public had a chance to iterate on DFC. The only public meeting was a facilitated (controlled) meeting without any real chance to debate the DFC or any other part of the plan. There was no response to our comments on the disjointed nature and lack of vision in the DFC's included in the draft SFMP. Therefore these statements are false, and disingenuous. Please remove or clarify these assertions. | 4.1 | Sentence revised to simply reflect public review of DFCs. |